

**Hancock Lumber / Ryefield
Cumberland County
Casco, Maine
A-629-71-D-N**

**Departmental
Findings of Fact and Order
Air Emission License
After-the-Fact**

After review of the air emissions license application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Hancock Lumber / Ryefield (Hancock) of Casco, Maine has applied for an after the fact renewal of their Air Emission License permitting the operation of emission sources associated with their lumber manufacturing facility.

B. Emission Equipment

Hancock is licensed to operate the following equipment:

Fuel Burning Equipment

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate</u>	<u>Fuel Type, % sulfur</u>	<u>Stack #</u>
Boiler #1	6.2	0.7 ton/hr	wood, negligible	1
Boiler #2	13.6	97.6 gal/hr	#2 fuel oil, 0.35%	2

Process Equipment

<u>Equipment</u>	<u>Production Rate</u>
Kilns(4)	16 MMBFT/yr

C. Application Classification

The previous air emission license for Hancock expired on April 23, 2001. A complete application was not submitted on time, therefore Hancock is considered to be an existing source applying for an after the fact license renewal. This facility is determined to be a minor source and the application has been processed through Chapter 115 of the Department's regulations.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Air Regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emission from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. Boiler #1

Boiler #1 is a stoker type wood fired boiler built by HRT Industrial. This boiler fires mostly green sawdust and is used for heating the kilns. Emissions from Boiler #1 are based on running at full capacity 8,760 hrs/yr.

Boiler #1 has a heat input of 6.2 MMBtu/hr, and is therefore not subject to the New Source Performance Standards (NSPS) Subpart Dc for steam generating units greater than 10 MMBtu/hr manufactured after June 9, 1989.

A summary of BPT for Boiler #1 is the following:

1. SO₂, NO_x, CO and VOC emission limits are based upon AP-42 data dated 2/99.
2. Chapter 103 regulates PM emission limits however in this case BPT for PM was determined to be a more stringent limit of 0.30 lb/MMBtu and shall be used. The PM₁₀ limits are derived from the PM limits.
3. Visible emissions from Boiler #1 shall not exceed 30% opacity on a 6 minute block average, except for no more than 2 six minute block averages in a continuous 3 hour period.

C. Boiler #2

Boiler #2 is Cleaver Brooks oil fired boiler. This boiler is rated at 97.6 gallons of fuel per hour which corresponds to a heat input of 13.6 MMBtu/hr. Boiler #2 was previously licensed at a heat input of 14.6 MMBtu/hr. This heat input is stamped on the unit's boiler plate however it is based on the firing of #6 fuel oil instead of #2 oil. Boiler #2 is used in the winter for additional heat to the kilns.

Boiler #2 was manufactured in 1982, and is therefore not subject to the New Source Performance Standards (NSPS) Subpart Dc for steam generating units greater than 10 MMBtu/hr manufactured after June 9, 1989.

A summary of the BPT for Boiler #2 is the following:

1. Total fuel use Boiler #2 shall not exceed 200,000 gal/year of #2 fuel oil, based on a 12 month rolling total, with a maximum sulfur content not to exceed 0.35% by weight.
2. Chapter 106 regulates fuel sulfur content, however in this case a BPT analysis for SO₂ determined a more stringent limit of 0.35% was appropriate and shall be used.
3. Chapter 103 regulates PM emission limits. The PM₁₀ limits are derived from the PM limits.
4. NO_x emission limits are based on data from similar #2 fired boilers of this size and age.
5. CO and VOC emission limits are based upon AP-42 data dated 9/98.
6. Visible emissions from Boiler #2 shall not exceed 30% opacity on a 6 minute block average, except for no more than 2 six minute block averages in a continuous 3 hour period.

D. Kilns

Hancock operates four kilns for drying lumber. Heat for the kilns is provided by Boilers #1 and/or #2. Yearly throughput is limited to 16.0 million board feet per year based on a 12 month rolling total.

E. Annual Emission Restrictions

Hancock shall be restricted to the following annual emissions, based on a 12 month rolling total:

Total Allowable Annual Emission for the Facility
(used to calculate the annual license fee)

<u>Pollutant</u>	<u>Tons/Year</u>
PM	9.8
PM ₁₀	9.8
SO ₂	5.1
NO _x	9.6
CO	41.5
VOC	18.8

III.AMBIENT AIR QUALITY ANALYSIS

According to the Maine Regulations Chapter 115, the level of air quality analyses required for a renewal source shall be determined on a case-by case basis. Modeling and monitoring are not required for a renewal if the total emissions of any pollutant released do not exceed the following:

<u>Pollutant</u>	<u>Tons/Year</u>
PM	50
PM ₁₀	25
SO ₂	50
NO _x	100
CO	250

Based on the above total facility emissions, Hancock is below the emissions level required for modeling and monitoring.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-629-71-D-N subject the following conditions:

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions.
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115.

- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both.
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request.
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353.
- (6) The license does not convey any property rights of any sort, or any exclusive privilege.
- (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions.
- (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request.
- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license.
- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license.

- (11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
- (i) perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
 - a. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
 - b. pursuant to any other requirement of this license to perform stack testing.
 - (ii) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
 - (iii) submit a written report to the Department within thirty (30) days from date of test completion.
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- (i) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
 - (ii) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
 - (iii) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.
- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for

the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.

- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emission and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation.
- (15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.
- (16) **Boiler #1**
- A. Boiler #1 shall fire only wood.
 - B. Emissions shall not exceed the following:

Equipment		PM	PM₁₀	SO₂	NO_x	CO	VOC
Boiler #1	lb/MMBtu	0.30	-	-	-	-	-
	lb/hr	1.86	1.86	0.05	1.03	9.37	0.15

- C. Visible emissions from Boiler #1 shall not exceed 30% opacity on a 6 minute block average, except for no more than 2 six minute block averages in a continuous 3 hour period.
- (17) **Boiler #2**
- A. Fuel use for Boiler #2 shall not exceed 200,000 gal/yr of #2 fuel oil (12 month rolling total) with a maximum sulfur content not to exceed 0.35% by weight. Fuel records, including gallons used and percent sulfur, shall be maintained on a monthly basis, in addition to the 12 month rolling total.
 - B. Hancock shall not fire Boiler #2 with any type of rain cap obscuring the stack exit.

C. Emissions shall not exceed the following:

Equipment		PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Boiler #2	lb/MMBtu	0.12	-	-	-	-	-
	lb/hr	1.64	1.64	4.80	4.93	0.49	0.02

D. Visible emissions from Boiler #2 shall not exceed 30% opacity on a 6 minute block average, except for no more than 2 six minute block averages in a continuous 3 hour period.

(18) **Kilns**

A. Hancock's kilns shall not exceed a yearly throughput of 16.0 million board feet per year based on a 12 month rolling total.

B. Hancock shall keep monthly records of board feet processed in the kilns.

(19) **Stockpiles and Roadways**

Potential sources of fugitive PM emissions including material stockpiles and roadways shall be controlled by wetting with water, with calcium chloride, or other methods as approved by the Bureau of Air Quality to prevent visible emissions in excess of 10% opacity, on a 3 minute block average basis.

(20) Hancock shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (Title 38 MRSA §605-C).

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(21) The term of this Order shall be for five (5) years from the signature below.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2001.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 8/3/01

Date of application acceptance: 8/15/01

Date filed with the Board of Environmental Protection: _____

This Order prepared by Lynn Ross, Bureau of Air Quality.

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05/10/04